

**Michael L. Schindele**

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**Idaho State Bar No. 1752**

U.S. DISTRICT COURT  
DISTRICT OF IDAHO  
CLERK OF COURT  
BOISE, IDAHO  
JUL 19 1999  
FILED

Attorney for Creditor / First Security Bank, N.A.

Our File No. 09-33543

IN THE UNITED STATES BANKRUPTCY COURT

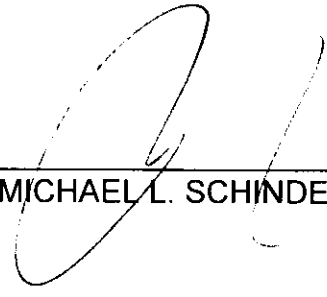
FOR THE DISTRICT OF IDAHO

IN RE:	)	
	)	Chapter 13
VLADIMIR PANIOUCHKINE,	)	
TATYANA PANIOUCHKINE,	)	Case No. 99-41879
	)	
	)	<b>OBJECTION TO AMENDED</b>
	)	<b>CHAPTER 13 PLAN</b>
	)	<b>AND RELATED MOTIONS</b>
Debtor(s).	)	
_____	)	

COMES NOW First Security Bank, N.A., by and through its attorney of record, Michael L. Schindele, herewith objects to the Chapter 13 Plan And Related Motions upon the grounds and for the reasons that the plan is proposed in bad faith (see insurance proceeds below) and proof of loss-payee coverage as to any of its collateral, that the rate of interest in the plan is a cramdown from the Idaho bar's customary 9%, that the leased unit aside, the plan only addresses First Security Bank, N.A.'s Lincoln and 1993 International at unacceptable values when the plan should contain the following regarding First Security Bank, N.A.'s secured loans:

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- No mention of one 1994 Dodge pickup 3500 or its insurance proceeds; At time of filing value was \$13,075.00. Balance on loan \$4,694.32;
  - No mention of one 1997 Mazda Protege or its insurance proceeds; Value was \$13,545.00. Balance on loan \$16,702.00; and
  - 1993 IHC Semi-Truck - N.A.D.A. is \$10,000.00 at 10%
- DATED this 24th day of March, 2000.



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MICHAEL L. SCHINDELE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of March, 2000, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Vladimir Paniouchkine  
Tatyana Paniouchkine  
255 Bonnie Dr.  
Twin Falls, ID 83301

☒ U. S. Mail  
☐ Hand Delivery  
☐ Overnight Mail  
☐ Telecopy

Jay D. Sudweeks  
Attorney at Law  
P.O. Box 1846  
Twin Falls, ID 83301

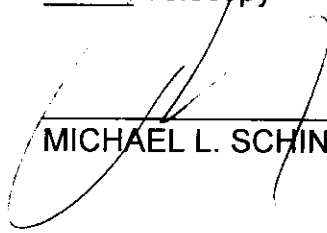
☒ U. S. Mail  
☐ Hand Delivery  
☐ Overnight Mail  
☐ Telecopy

L.D. Fitzgerald  
P.O. Box 6199  
Pocatello, ID 83205-6199

☒ U. S. Mail  
☐ Hand Delivery  
☐ Overnight Mail  
☐ Telecopy

Jeff Howe  
U.S. Trustee  
P.O. Box 110  
Boise, ID 83701

☒ U. S. Mail  
☐ Hand Delivery  
☐ Overnight Mail  
☐ Telecopy

  
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MICHAEL L. SCHINDELE